

July 19, 2018

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Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-B204
Washington, D.C. 20554

**Re: Citizens Broadband Radio Service
Ex Parte Notification
GN Docket No. 17-258**

Dear Ms. Dortch:

We are fixed wireless broadband providers. We serve hard-to-reach places that no one else will: remote farms, schools, libraries, healthcare institutions, and other businesses that but for us would have no broadband or no broadband competition. But we are running out of the critical infrastructure we need to serve rural America: spectrum.

For decades, we have served rural families and businesses using unlicensed spectrum. But that spectrum is becoming more crowded with each passing day. We have customers within range of our towers that we cannot serve because we do not have access to adequate spectrum to do so.

But the FCC can help. Continued access to Citizens Broadband Radio Service (“CBRS”) spectrum is vital to our ability to continue serving rural America. And we write to urge the FCC to ensure that census tracts remain available as bidding units for Priority Access Licenses (“PALs”) in the CBRS band. We ask you to reject options that take census tracts off the table and propel rural broadband access backwards instead of forwards. Without census-tract-sized licenses, we will have virtually no ability to acquire protected spectrum in this band. That would be an intolerable outcome that would harm our rural broadband businesses and inhibit our ability to grow, but worse it would harm the millions of consumers for whom mid-band spectrum is the key to high-speed fixed broadband access.

Over the last year, many of us have spoken and written to the FCC to explain why census-tract licenses in the CBRS band are critical to rural economic development and our ability to provide broadband to more rural consumers. We’ve provided maps showing that auctioning larger areas will effectively shut us out of the auction. We’ve explained that we’ve already invested in the CBRS band under the current rules by deploying software-defined radios in the 3650-3700 MHz band that can be easily upgraded to operate in the entire 3550-3700 MHz band, reaching more rural consumers within months. And we’ve explained how we’ve curtailed our investments based on the threat that we may not be able to bid for census tract PALs. While our businesses and networks are diverse and independent, we are united that census tracts are the only way that we can participate in the CBRS band auction.

We recognize the national priority of promoting 5G wireless technology. But 5G is not for mobile wireless only. We, too, want to deploy 5G to connect more devices and support precision agriculture and other industrial and enterprise solutions. “Winning the race to 5G” does *not* mean we

need to let the most powerful companies in the mobile wireless industry define the rules of the road.

Our economy depends on small businesses like ours, and we are poised to invest – if the FCC gets the rules right.

We reluctantly acknowledge that the rules are likely to be changed, that we will no longer have access to seven census tract PALs. But there is no reason why, out of those seven PALs, that the FCC cannot retain at least two census tract PALs in rural areas to facilitate broadband deployment in the areas where we live and work. We urge the FCC, in the strongest possible terms, to preserve our ability, and the ability of other stakeholders, to bid on census tract PALs in rural areas.

Respectfully submitted,

Alan Fitzpatrick
Chief Executive Officer
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